

Exhibit A

EXHIBIT A

**NUCURRENT, INC.’S PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS, PHRASES,
AND CLAUSES AND PROPOSED EVIDENCE IN SUPPORT**

SAMSUNG’S ASSERTED § 112 TERMS

No.	Term	NuCurrent’s Proposed Construction	Samsung’s Position	NuCurrent’s Supporting Evidence¹
1.	“at least one of the first conductor layer” (’960 Patent, Claim 4)	Not indefinite A person of ordinary skill in the art would understand this term to refer to “the first conductor layer.”	Indefinite (“at least one of the first conductor layer” is incomplete)	’960 Patent, Claim 4 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
2.	“at a given frequency” (’960 Patent, Claims 5-7; ’046 Patent, Claims 5-7)	Not indefinite A person of ordinary skill in the art would understand this term to refer to a resonant or operational frequency of the inductor.	Indefinite (unclear where the “given frequency” is measured)	Information in the following passages: ’960 at 7:42-56; 27:22-28; 24:60-67; ’046 at 7:42-56; 27:22-28; 24:60-67. ’960 Patent, Claims 5-7 ’046 Patent, Claims 5-7 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.

¹ NuCurrent reserves the right to rely on for its benefit any and all intrinsic and extrinsic evidence cited by Samsung, the patents-in-suit and their file histories, and the expert testimony of Dr. Daniel W. Engels, including any testimony to respond to Samsung’s positions.

3.	<p>“at least one connector” (’960 Patent, Claim 18)</p>	<p>Not indefinite</p> <p>A person of ordinary skill in the art would understand this term to require there to be at least two connectors to electrically connect the first conductor layer and second conductor layer in parallel.</p>	<p>Indefinite (unclear whether “at least one connector” refers to the connector of claim 1, or another connector)</p>	<p>’960 Patent, Claim 18</p> <p>NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.</p>
4.	<p>“at least the first and second conductor layers has at least a partial revolution”</p> <p>(’960 Patent, Claim 25; ’046 Patent, Claim 24; ’591 Patent, Claim 25; ’948 Patent, Claim 25)</p>	<p>Not indefinite.</p> <p>A person of ordinary skill in the art would understand this term to apply to both the first conductive layer and the second conductive layer.</p> <p>A person of ordinary skill in the art would understand “partial revolution” to mean that the conductor does not complete a full turn.</p>	<p>Indefinite (it is unclear which of the first and second conductor layers has a partial revolution; unclear what constitutes a partial revolution)</p>	<p>’960 Patent, Claim 25; ’046 Patent, Claim 24; ’591 Patent, Claim 25; ’948 Patent, Claim 25.</p> <p>NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.</p>
5.	<p>“at least one insulator layer”</p> <p>(’960 Patent, Claim 27; ’046 Patent, Claim 26; ’591 Patent, Claim 27; ’948 Patent, Claim 27)</p>	<p>Not indefinite.</p> <p>A person of ordinary skill in the art would understand this term to refer to “the insulator layer.”</p>	<p>Indefinite (it is unclear whether the “at least one insulator layer” refers to the insulator layer of claim 1, or another insulator layer)</p>	<p>’960 Patent, Claim 27; ’046 Patent, Claim 26; ’591 Patent, Claim 27; ’948 Patent, Claim 27</p> <p>NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.</p>
6.	<p>“the first conductor layer”</p>	<p>Not indefinite.</p>	<p>Indefinite (“first conductor layer” lacks antecedent basis)</p>	<p>’960 Patent, Claim 29</p>

	('960 Patent, Claim 29)	A person of ordinary skill in the art would understand this term to get its antecedent basis from “a first conductive conductor layer,” where the term conductive is merely used as an adjective.		NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
7.	“wherein the first and second conductor layers are connected electrically in parallel” (’046 Patent, Claim 19)	Not indefinite. A person of ordinary skill in the art would understand this term to clarify and reiterate that the first conductive layer and second conductive layer are connected in parallel in contrast with their connection in series to the third and fourth conductive layers.	Indefinite (it is unclear whether there is a new parallel connection between the first and second conductor layers)	’046 Patent, Claim 19 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
8.	“the inductor” (’046 Patent, Claim 28)	Not indefinite. A person of ordinary skill in the art would understand this term to refer to “the inductor structure.”	Indefinite (unclear whether “inductor” refers to inductor structure, first inductor subassembly, or second inductor subassembly)	’046 Patent, Claim 28 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
9.	“[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil” (’729 Patent, Claim 1)	Not indefinite. See proposed construction below at Proposed Claim Terms No. 7	Indefinite (it is unclear how the two coils are positioned with respect to each other)	’729 Patent, Claim 1 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.

10.	“has a variable wire width” (’729 Patent, Claim 11)	Not indefinite. See proposed construction below at Proposed Claim Terms No. 11	Indefinite (it is unclear how much wire width varies)	’729 Patent, Claim 11 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
11.	“unshielded inductance” (’729 Patent, Claim 24)	Not indefinite. A person of ordinary skill in the art would understand this term to refer to the inductance of the coil without shielding.	Indefinite (it is unclear what constitutes an unshielded inductance)	’729 Patent, Claim 24 Information in the following passages: ’729 Patent at 23:45-49 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.

SAMSUNG’S PROPOSED CLAIM TERMS

No.	Term	NuCurrent’s Proposed Construction	Samsung’s Position	Supporting Evidence ²
1.	“selecting an adjustable inductor quality factor” (’591 Patent, Claims 1, 35)	Plain and ordinary meaning <u>Alternative:</u> “changing the inductor quality factor”	“switching an electrical connection between the first and second conductors”	’591 Patent, Claims 1, 35 Information in the following passages: ’591 Patent at 5:51-52; 6:63-66; 29:4-30. NuCurrent intends to rely on expert testimony in the form of a

² See note 1.

No.	Term	NuCurrent's Proposed Construction	Samsung's Position	Supporting Evidence ²
				declaration from Dr. Daniel W. Engels regarding this term.
2.	<p>“electrically connectable” (’591 Patent, Claims 1, 20, 21, 24, 35, 39); (’960 Patent, Claims 21, 24); (’948 Patent, Claims 1, 20, 21, 24, 33)</p> <p>“electrically connected/connecting” (’591 Patent, Claims 1, 20, 35, 37); (’960 Patent, Claims 1, 20, 29); (’046 Patent, Claims 17, 19); (’948 Patent, Claims 1, 18, 20, 29, 31)</p>	<p>Plain and ordinary meaning</p> <p><u>Alternative</u>: “capable of being linked together by means of electricity”</p> <p><u>Alternative</u>: “linked together by means of electricity”</p>	<p>“capable of being physically connected by a conductive path”</p> <p>“physically connected/connecting by a conductive path”</p>	<p>’591 Patent, Claims 1, 20, 21, 24, 35, 39; ’960 Patent, Claims 21, 24; ’948 Patent, Claims 1, 20, 21, 24, 33; ’591 Patent, Claims 1, 20, 35, 37; ’960 Patent, Claims 1, 20, 29; ’046 Patent, Claims 17, 19; ’948 Patent, Claims 1, 18, 20, 29, 31</p> <p>Information in the following passages: ’960 Patent at 31:32-27; ’591 Patent at 31:32-27; ’948 Patent at 31:32-27; ’046 Patent at 31:32-27</p> <p>Webster’s New World College Dictionary (11th Ed. 2003), NUCUR-0015574</p> <p>Klaus Finkenzeller, RFID Handbook, <i>Fundamentals and Applications in Contactless Smart Cards and Identification</i> (2nd Ed. 2003), NUCUR-0015579</p> <p>D. Uysal, <i>Improving the Readability of RFID Tagged Pharmaceutical Products and Food</i></p>

No.	Term	NuCurrent's Proposed Construction	Samsung's Position	Supporting Evidence ²
				<p><i>Supplements Inside a Modified Sealed Tote</i>, NUCUR-0015588</p> <p>NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.</p>
3.	“electrically parallel connection” (’046 Patent, Claim 1)	<p>Plain and ordinary meaning</p> <p><u>Alternative</u>: “linked together in parallel by means of electricity”</p>	“physically connected in parallel by a conductive path or paths”	<p>’046 Patent, Claim 1</p> <p>Information in the following passages: ’046 Patent at 31:32-27</p> <p>Webster’s New World College Dictionary (11th Ed. 2003), NUCUR-0015574</p> <p>Klaus Finkenzeller, <i>RFID Handbook, Fundamentals and Applications in Contactless Smart Cards and Identification</i> (2nd Ed. 2003), NUCUR-0015579</p> <p>D. Uysal, <i>Improving the Readability of RFID Tagged Pharmaceutical Products and Food Supplements Inside a Modified Sealed Tote</i>, NUCUR-0015588</p>

No.	Term	NuCurrent's Proposed Construction	Samsung's Position	Supporting Evidence ²
				NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
4.	"adjusting an input power level of the power source" ('591 Patent, Claim 1)	Plain and ordinary meaning <u>Alternative</u> : "adjusting the power level supplied to the power source"	"adjusting the power level supplied to the power source for the first electrical circuit"	'591 Patent, Claim 1 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
5.	"adjusting a power level of the power source" ('591 Patent, Claim 35); ('948 Patent, Claims 1, 29)	Plain and ordinary meaning <u>Alternative</u> : "adjusting the power level of the power source"	"adjusting the power level of the power source for the first electrical circuit"	'591 Patent, Claim 35; '948 Patent, Claims 1, 29 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
6.	Nth "conductor layer" ('960 Patent, Claims 1, 4-8, 10, 12, 16, 18-20, 25-26, 29); ('046 Patent, Claims 1, 5-8, 10, 15, 17-19, 24-25, 28); ('591 Patent Claims 25, 35) Nth "conductor"	"a material, other than Litz wires and stranded traces, that conducts electricity"	Second conductor layer: "a conductor layer overlapping the first conductor layer" Third conductor layer: "a conductor layer overlapping the second conductor layer" Fourth conductor layer: "a conductor layer overlapping the third conductor layer"	'960 Patent, Claims 1, 4-8, 10, 12, 16, 18-20, 25-26, 29; '046 Patent, Claims 1, 5-8, 10, 15, 17-19, 24-25, 28; '591 Patent Claims 25, 35; '591 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 35; '948 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 29. Information in the following passages: '960 Patent at 3:45-67.

No.	Term	NuCurrent's Proposed Construction	Samsung's Position	Supporting Evidence ²
	('591 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 35); ('948 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 29)		Second conductor: "a conductor overlapping the first conductor" Third conductor: "a conductor overlapping the second conductor" Fourth conductor: "a conductor overlapping the third conductor"	'046 Patent at 3:45-67. '591 Patent at 3:45-67. '948 Patent at 3:45-67. Information in the following: Application No.: 13/233,569, Office Action dated August 01, 2014. NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
7.	"[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil" ('729 Patent, Claim 1)	Plain and ordinary meaning <u>Alternative:</u> [wherein the second coil is disposed on the substrate surface] positioned at least (1) within the first coil or (2) adjacent to the first coil	"[wherein the second coil is disposed on the substrate surface] positioned within an inner perimeter formed by the innermost turn of the first coil, either in the same plane as the first coil or in a second plane" OR Indefinite	'729 Patent, Claim 1 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
8.	"wherein the first end of the second coil meets and joins the second end of the first coil forming a continuous junction therebetween" ('729 Patent, Claim 1)	Plain and ordinary meaning	"wherein an electrical connection is established between the first end of the second coil and the second end of the first coil forming a continuous connection therebetween"	'729 Patent, Claim 1 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.

No.	Term	NuCurrent's Proposed Construction	Samsung's Position	Supporting Evidence ²
9.	"a third gap separating the outermost turn of the second coil from the innermost turn of the first coil" ('729 Patent, Claim 1)	Plain and ordinary meaning <u>Alternative:</u> "a third space separating the outermost turn of the second coil from the innermost turn of the first coil"	"a third space of nonconductive material separating the outermost turn of the second coil from the innermost turn of the first coil"	'729 Patent, Claim 1 Information in the following passages: '729 Patent at Fig. 2; 20:53, 21:16-19. NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
10.	"wherein a tunable inductance is generatable by electrically connecting two of the first, second and third terminals" ('729 Patent, Claim 1)	Plain and ordinary meaning	"wherein the inductance can be changed by establishing an electrical connection between two of the first, second, and third terminals"	'729 Patent, Claim 1 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.
11.	"has a variable wire width" ('729 Patent, Claim 11)	Plain and ordinary meaning <u>Alternative:</u> "has a non-constant width"	"has a width that forms a single continuous taper from end to end" OR Indefinite	'729 Patent, Claim 11 Webster's New World College Dictionary (11th Ed. 2003), NUCUR-0015574 NuCurrent intends to rely on expert testimony in the form of a declaration from Dr. Daniel W. Engels regarding this term.